

EXHIBIT C

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT 106

HON. LARRY P. FIDLER, JUDGE

-000-

THE PEOPLE OF THE STATE OF CALIFORNIA,)
)
 PLAINTIFF)
) NO. BA455469
 VS.)
)
 PAUL TURLEY,)
)
 DEFENDANT.)
)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

MONDAY, MAY 6, 2024

APPEARANCES:

FOR THE PEOPLE: LOS ANGELES DISTRICT ATTORNEY
BY: DAYAN MATHAI, DEPUTY
KAREN NISHITA, DEPUTY
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LOS ANGELES, CALIFORNIA 90012

FOR THE DEFENDANT: LAW OFFICE OF ROBERT MOEST
BY: ROBERT MOEST
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1 THE COURT: NOW, DO YOU HAVE -- THE WITNESSES YOU
2 PLAN TO OFFER, DO THEY HAVE ANYTHING TO DO WITH
3 MR. TURLEY?

4 MR. MATHAI: YES. I INTEND TO CALL MARISA
5 NELSON.

6 THE COURT: OKAY.

7 MR. MATHAI: BUT I DO ALSO WANT TO ASK HER ABOUT
8 MEDCONSULT AND HER KNOWLEDGE OF WHAT MR. TURLEY HAS
9 TESTIFIED TO REGARDING THE PAYMENTS ON THE PROPERTIES.

10 THE COURT: OKAY.

11 MR. MATHAI: AND THE LAWSUIT THAT SHE'S HAD BY
12 FRONTLINE AND OTHERS.

13 SHANNON DEVANE IS AVAILABLE, ALSO VERY
14 SHORT TESTIMONY ABOUT MEDCONSULT AND CONNEMARA, AMBER
15 WOODLEY, AND THEN THIS ISSUE OF WHAT PAUL TURLEY
16 DISCUSSED WITH HER IN COURT IN SAN DIEGO.

17 THE COURT: OKAY. THEN I GUESS YOU WILL REMAIN.

18 MR. MOEST: I GUESS I'LL NEED TO HEAR WHAT IS
19 SAID.

20 THE COURT: I IMAGINE YOU WANT TO REMAIN BECAUSE
21 YOU MAY BE ELIGIBLE IF ANY OF THE QUESTIONS GO TO
22 DR. TURLEY'S CREDIBILITY OR ANYTHING TO CROSS-EXAMINE.

23 MR. MOEST: CORRECT.

24 THE COURT: OKAY. LET'S PROCEED.

25 WHO IS YOUR NEXT WITNESS?

26 MR. MATHAI: MARISA NELSON.

27 AND WITH THE COURT'S PERMISSION -- I
28 CLEARED THIS WITH THE JUDICIAL ASSISTANT. -- AMY JACKS

1 IS GOING TO LISTEN IN ON MY PHONE.

2 THE COURT: FINE. OKAY.

3

4 (RECESS TAKEN.)

5

6 MR. MATHAI: YOUR HONOR, FOR THE RECORD, AMY
7 JACKS IS ON SPEAKER PHONE ON MY PHONE, AND I'M GOING TO
8 PLACE THE PHONE -- SHE'S GOING TO MUTE HER SIDE, AND
9 I'M GOING TO JUST PLACE MY PHONE NEXT TO THE WITNESS
10 STAND SO SHE CAN HEAR IT.

11 THE COURT: OKAY.

12 AND THIS ARRANGEMENT IS GOOD FOR YOU,
13 MS. NELSON?

14 THE WITNESS: YES.

15 MR. MOEST: WHO IS THIS PERSON.

16 MR. MATHAI: AMY JACKS IS THE LAWYER FOR MARISA
17 NELSON.

18 MR. MOEST: OKAY. THANK YOU. GOT IT. THAT
19 HADN'T BEEN SAID THIS AFTERNOON.

20 THE COURT: ALL RIGHT. MR. TURLEY IS PRESENT
21 AGAIN.

22 GO AHEAD AND SWEAR THE WITNESS, PLEASE.

23

24 MARISA NELSON,
25 CALLED BY THE PEOPLE, AS A WITNESS,
26 WAS SWORN AND TESTIFIED AS FOLLOWS:

27

28 THE CLERK: YOU DO SOLEMNLY STATE THAT THE

1 TESTIMONY YOU ARE ABOUT TO GIVE IN THE CAUSE NOW
2 PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE WHOLE
3 TRUTH AND NOTHING BUT THE TRUTH, SO HELP YOU, GOD?

4 THE WITNESS: YES.

5 THE CLERK: PLEASE STEP FORWARD AND BE SEATED IN
6 THE WITNESS STAND.

7 PLEASE ADJUST THE MICROPHONE COMFORTABLY
8 IN FRONT OF YOU. SPEAKING INTO THE MICROPHONE, PLEASE,
9 STATE AND THEN SPELL YOUR FULL NAME FOR THE RECORD.

10 THE WITNESS: MARISA NELSON, M-A-R-I-S-A,
11 N-E-L-S-O-N.

12 THE COURT: THANK YOU.

13 YOU MAY PROCEED.

14 MR. MATHAI: THANK YOU.

15

16 DIRECT EXAMINATION

17 BY MR. MATHAI:

18 Q MA'AM, WERE YOU AT ONE POINT IN TIME A
19 DEFENDANT IN THE CRIMINAL CASE THAT WAS PROSECUTED IN
20 THIS COURTHOUSE AND IN THIS COURTROOM?

21 A YES.

22 Q AND AT SOME POINT IN TIME DID YOU ENTER A
23 GUILTY PLEA AND ENTER A COOPERATION AGREEMENT WITH THE
24 PROSECUTION TO COOPERATE UNTIL SUCH TIME THAT YOU CAN
25 BE SENTENCED?

26 A YES.

27 Q AND SO FOR THE LAST FIVE OR SIX YEARS HAVE
28 YOU BEEN PARTICIPATING WITH THE PROSECUTION IN THAT

1 COOPERATION AGREEMENT?

2 A YES.

3 Q AND DURING THAT TIME, WERE YOU REPRESENTED
4 THE ENTIRE TIME YOUR PLEA, YOUR COOPERATION AGREEMENT
5 AND THE COOPERATION ITSELF, WAS THAT -- WERE YOU
6 REPRESENTED BY AMY JACKS?

7 A YES.

8 Q AND DID YOU GIVE A FACTUAL STATEMENT AS
9 PART OF YOUR PLEA HERE IN OPEN COURT UNDER OATH?

10 A YES.

11 Q AND DID YOUR PLEA AND THE FACTUAL
12 STATEMENT THAT YOU GAVE REVOLVE AROUND MUCH -- MUCH OF
13 IT REVOLVE AROUND YOUR RELATIONSHIP WITH MUNIR UWAYDAH,
14 AND FRONTLINE MEDICAL ASSOCIATES AND RELATED ENTITIES?

15 A YES.

16 Q WHAT WAS YOUR -- I KNOW THERE'S A LOT TO
17 SAY ABOUT ALL OF THAT, BUT IF YOU COULD, JUST SUMMARIZE
18 FOR THE COURT IN GENERAL WHAT WAS YOUR ROLE IN THE
19 ORGANIZATION -- MUNIR UWAYDAH'S WORLD OR HIS
20 ORGANIZATION?

21 A I INITIALLY WAS HIRED AND STARTED AS A
22 PERSONAL ASSISTANT. I DID SOME MANAGING OF HIS MEDICAL
23 PRACTICE BACK IN MICHIGAN. I'M ORIGINALLY FROM OHIO.

24 AND THEN WHEN I CAME OUT HERE, I WAS
25 PRIMARILY HIS PERSONAL ASSISTANT. AND THEN I SLOWLY
26 BECAME MANAGER. OR I SLOWLY HAD MY NAME ON DIFFERENT
27 COMPANIES OF HIS. AND I WOULD BE IN CONTROL OF THE --
28 WELL, I WASN'T IN CONTROL OF THE BANK ACCOUNT, BUT I

1 HAD SIGNER ABILITY ON BANK ACCOUNTS FOR HIM. SO I
2 WOULD TRANSFER HIS MONEY BACK AND FORTH WHEREVER HE
3 WANTED.

4 Q OKAY. AND FAIR TO SAY THAT IN THAT ROLE
5 YOU CONTROLLED LOTS OF BANK ACCOUNTS FOR THE BENEFIT OF
6 MUNIR UWAYDAH?

7 A YES.

8 Q GIVE US A ROUGH IDEA HOW MANY BANK
9 ACCOUNTS AT THE HEIGHT OF YOUR WORK WITH UWAYDAH WOULD
10 YOU ESTIMATE THAT YOU HAD YOUR NAME ON FOR HIS BENEFIT?

11 A AT ANY GIVEN TIME THERE WAS AT LEAST EIGHT
12 TO TEN. BUT OVERALL THERE WAS OVER 20 COMPANIES I
13 THINK THAT I HAD ESTABLISHED BANK ACCOUNTS OR HAD BEEN
14 ASSOCIATED WITH BANK ACCOUNTS ON BEHALF OF UWAYDAH.

15 Q AND BASED ON YOUR KNOWLEDGE OF HIM AND
16 YOUR WORK WITH HIM --

17 DID YOU WORK WITH HIM FOR MANY YEARS?

18 A YES.

19 Q ABOUT HOW MANY YEARS DID YOU WORK?

20 A TEN.

21 Q AND BASED ON YOUR KNOWLEDGE OF HIM AND
22 YOUR WORK RELATIONSHIP WITH HIM, DID YOU OBSERVE THAT
23 THERE WAS A PATTERN OF BEHAVIOR WITH REGARDS TO
24 THESE -- HOW HE CONTROLLED THESE BUSINESS ENTITIES AND
25 BANK ACCOUNTS?

26 A YES.

27 Q WAS HE A CONTROLLING PERSON?

28 A YES.

1 Q DID HE HAVE ULTIMATE CONTROL OVER THE
2 ENTITIES AND THE BANK ACCOUNTS?

3 A YES.

4 Q DID HE HAVE THAT CONTROL EVEN IF IT
5 APPEARED THAT OTHER PEOPLE, OTHER PEOPLE HAD CONTROL BY
6 VIRTUE OF THEIR NAME BEING ON THE ENTITY AND/OR THE
7 BANK ACCOUNTS?

8 A YES.

9 Q AND WAS THAT TRUE WITH REGARD TO YOUR NAME
10 BEING USED?

11 A YES. THERE WAS AN ACCOUNT IN MY NAME
12 ALSO.

13 Q AND YOU SAID THAT THERE WAS LOTS OF BANK
14 ACCOUNTS. EACH ONE OF THOSE ENTITIES THAT YOU TALKED
15 ABOUT, WERE THERE OFTEN MULTIPLE BANK ACCOUNTS
16 ASSOCIATED WITH EACH ONE?

17 A NEAR THE TIME BEFORE I LEFT, I THINK THERE
18 WAS MULTIPLE ACCOUNTS FOR, LIKE, FRONTLINE OR THE
19 MEDICAL PRACTICES. BUT GENERALLY SPEAKING, MOST OF THE
20 COMPANIES ONLY HAD ONE BANK ACCOUNT.

21 Q OKAY. AND DID YOU -- WAS THERE AN ENTITY
22 THAT YOU CREATED OR USED TO FUNNEL MONEY FROM THE
23 VARIOUS ACCOUNTS FOR THE BENEFIT OF MUNIR UWAYDAH?

24 A THE ACCOUNT THAT WAS CALLED SHERMBECK
25 MANAGEMENT, WHICH IS MY MAIDEN NAME. MARISA SHERMBECK
26 IS MY MAIDEN NAME. THAT WAS USED AS THE GO-BETWEEN IF
27 I NEEDED TO TRANSFER MONEY FOR UWAYDAH FROM ONE COMPANY
28 TO ANOTHER.

1 Q DID YOU KNOW OF A MOTIVATION FROM MUNIR
2 UWAYDAH AS TO WHY HE DIDN'T PUT HIS OWN NAME ON
3 ENTITIES HE CONTROLLED OR BANK ACCOUNTS THAT HE
4 BENEFITED FROM OR CONTROLLED?

5 A THERE'S A COUPLE OF REASONS. EITHER HE
6 DIDN'T WANT DEBTORS OR CREDITORS TO KNOW THAT HE HAD
7 ANY MONEY. AND ALSO HE JUST -- HE HAD COMPANIES THAT
8 HE, AS AN M.D., WASN'T ALLOWED TO HAVE.

9 Q OKAY. WAS THERE A -- EARLY ON IN YOUR
10 RELATIONSHIP WITH MUNIR UWAYDAH WAS THERE A LAWSUIT
11 BETWEEN HIM AND GE, GENERAL ELECTRIC, REGARDING SOME
12 MEDICAL EQUIPMENT?

13 A YES.

14 Q WHAT IMPACT --

15 WHAT HAPPENED IN THAT CASE?

16 A THERE WAS A JUDGMENT ENTERED AGAINST
17 UWAYDAH FOR A MILLION DOLLARS, AND HE FOUGHT VEHEMENTLY
18 AGAINST THAT. AND I USED TO SAY THAT HE WOULD SPEND
19 MILLIONS OF DOLLARS JUST TO NOT HAVE TO PAY GE THE
20 MILLION THAT HE OWED.

21 SO HE DID ANYTHING IN HIS POWER TO NOT
22 HAVE ANY MONEY IN HIS NAME SO THAT THEY COULDN'T
23 COLLECT ON THAT.

24 Q TO YOUR KNOWLEDGE, DID HE EVER PAY THAT
25 MILLION DOLLAR JUDGMENT TO GE?

26 A NOT THAT I'M AWARE OF.

27 Q DID YOU SEE -- OVER THE TEN YEARS THAT YOU
28 WORKED FOR HIM, DID YOU SEE THAT HE ACTED IN THAT WAY

1 WITH REGARDS TO HIDING ASSETS OVER THE YEARS?

2 A YES. HE NEVER WANTED ANYTHING IN HIS
3 NAME.

4 Q AND CAN YOU GIVE US EXAMPLES OF HOW THAT
5 PLAYED OUT OR HOW THAT WAS TRUE?

6 A THERE WERE PROPERTIES THAT WERE PURCHASED
7 IN OTHER PEOPLE'S NAMES, COMPANY NAMES, CARS, AND THEN
8 THE COMPANIES THEMSELVES WITH THE MONEY THAT WOULD GO
9 TOWARDS OTHER THINGS.

10 Q WITH REGARDS TO THE BANK ACCOUNTS, IS IT
11 FAIR TO SAY THAT THE AMOUNT OF MONEY THAT YOU
12 CONTROLLED FOR THE BENEFIT OF UWAYDAH WAS IN THE
13 MILLIONS?

14 A YES.

15 Q WAS IT FAIR TO SAY IT WAS IN THE TENS OF
16 MILLIONS?

17 A YES.

18 Q COULD IT HAVE BEEN IN THE HUNDREDS OF
19 MILLIONS?

20 A IT'S BEEN A LONG TIME SINCE I LOOKED AT
21 NUMBERS, BUT POSSIBLY.

22 Q OKAY. SO A LOT OF MONEY THAT YOU HELPED
23 MANAGE?

24 A YES.

25 Q AND DID -- YOU MENTIONED IN YOUR PREVIOUS
26 ANSWER THAT HE WOULD HIDE HIS CONTROL OF ASSETS BY
27 PUTTING REAL ESTATE IN OTHER PEOPLE'S NAMES AS WELL.

28 CORRECT?

1 A YES.

2 Q ARE YOU AWARE OF ANY PARTICULAR EXAMPLES
3 OF HIM DOING THAT WITH REGARDS TO REAL ESTATE?

4 A THERE WERE -- NEAR THE END OF MY, KIND OF,
5 TENURE WITH WORKING WITH UWAYDAH, THERE WERE A FEW
6 PROPERTIES THAT HE ACQUIRED. AND THEY WERE, LIKE, A
7 COUPLE OF PROPERTIES IN MARINA DEL REY THAT HE
8 PURCHASED IN COMPANY NAMES. AND THEN THERE WAS BEVERLY
9 GROVE PLACE. AND THEN THERE WAS 5507 AND 5509 OCEAN
10 FRONT WALK. AND THEN THERE WAS ANOTHER ONE ON OCEAN
11 FRONT WALK.

12 Q LET ME READ YOU --

13 A 5507.

14 Q LET ME READ TO YOU SOME ADDRESSES AND ASK
15 YOU IF YOU RECOGNIZE THEM.

16 5509 OCEAN FRONT WALK IN MARINA DEL REY,
17 5007 OCEAN FRONT WALK IN MARINA DEL REY, 1316 BEVERLY
18 GROVE PLACE IN BEVERLY HILLS, AND 34 GALLEON STREET
19 ALSO IN MARINA DEL REY.

20 A YES, ALL OF THOSE.

21 Q ARE THOSE FOUR PROPERTIES THAT YOU
22 RECOGNIZE, BASED ON YOUR EXPERIENCE WITH MUNIR UWAYDAH,
23 AS BEING OWNED AND CONTROLLED BY MUNIR UWAYDAH?

24 A YES.

25 Q WERE YOU AWARE THAT THESE PROPERTIES WERE
26 ACTUALLY PURCHASED IN THE NAME OF PAUL TURLEY?

27 A I DO REMEMBER PAUL TURLEY AS BEING -- NAME
28 BEING ON SOME OF THE REAL ESTATE. I JUST DON'T

1 REMEMBER SPECIFICALLY IF IT WAS JUST BEVERLY GROVE
2 PLACE OR NOT.

3 Q OKAY. AND YOU KNOW --

4 WHO IS PAUL TURLEY?

5 A WHO IS PAUL TURLEY?

6 Q YEAH.

7 A HE WAS AN ASSOCIATE. HE WAS A CHIRO- --
8 ORIGINALLY A CHIROPRACTOR THAT BECAME PARTNER WITH
9 UWAYDAH FOR FRONTLINE MEDICAL, AMONG A FEW OTHER
10 SMALLER COMPANY.

11 Q YOU SEE HIM IN THIS COURTROOM TODAY?

12 A YES.

13 Q JUST TELL US WHERE HE'S SEATED AND WHAT
14 HE'S WEARING, PLEASE.

15 A HE'S SITTING OVER ACROSS FROM YOU WEARING
16 A BLUE SHIRT.

17 THE COURT: INDICATING MR. TURLEY FOR THE RECORD.

18 MR. MATHAI: THANK YOU.

19 Q AND WHEN MUNIR UWAYDAH HAD PROPERTIES SUCH
20 AS THE ONES WE LISTED, YOU SAID THAT YOU BELIEVE THAT
21 THEY WERE MUNIR UWAYDAH'S PROPERTY, BUT THEY WERE IN
22 OTHER PEOPLE'S NAMES.

23 WHO PAID FOR THE PROPERTIES -- WHO PAID,
24 LIKE, FOR EXAMPLE, THE DOWN PAYMENT TO GET THE LOANS?

25 A THE MONEY ULTIMATELY CAME FROM UWAYDAH. I
26 DON'T REMEMBER SPECIFICS, BUT UWAYDAH FUNDED ALL OF
27 THEM.

28 Q WHAT ABOUT THE MONTHLY MORTGAGE PAYMENTS?

1 A UWAYDAH.

2 Q AND WHO WOULD COORDINATE THOSE PAYMENTS?

3 A I WAS IN CHARGE OF MAKING SOME MONTHLY
4 MORTGAGE PAYMENTS, AND I THINK SHELLY ROSE KELLY. AND
5 I DON'T KNOW WHO AFTER THAT WAS.

6 Q OKAY. TO YOUR KNOWLEDGE, IF PAUL TURLEY
7 HAD HIS NAME ON A PROPERTY THAT WAS ULTIMATELY
8 CONTROLLED AND OWNED BY MUNIR UWAYDAH, WOULD HE KEEP UP
9 THE APPEARANCE THAT IT WAS HIS PROPERTY AND HIS LOAN BY
10 SENDING IN THE MORTGAGE PAYMENT?

11 A NOT THAT I CAN RECALL, NO.

12 Q I WANT TO SHOW YOU WHAT WE PREVIOUSLY
13 MARKED IN THIS CASE AS PEOPLE'S NO. 1 FOR
14 IDENTIFICATION. THIS IS -- PURPORTS TO BE A CHECK FROM
15 A COMPANY CALLED L.A. HEALTH PARTNERS MEDICAL GROUP.

16 ARE YOU FAMILIAR WITH THAT GROUP?

17 A YES.

18 Q HOW ARE YOU FAMILIAR WITH THAT?

19 A THAT WAS ONE OF THE COMPANIES THAT PAUL
20 TURLEY AND UWAYDAH WERE BOTH OWNERS OF.

21 Q OKAY. AND DO YOU RECOGNIZE THE WRITING ON
22 THAT CHECK?

23 A YES. IT'S MARIA TURLEY'S.

24 Q WHAT ABOUT THE SIGNATURE?

25 A LOOKS LIKE PAUL TURLEY'S.

26 Q OKAY. AND DO YOU KNOW MARIA TURLEY?

27 A YES.

28 Q WHO IS SHE?

1 A SHE IS PAUL'S WIFE, AND I KNEW HER THROUGH
2 THE COURSE OF WORKING WITH UWAYDAH AND PAUL.

3 Q OKAY. AND DID SHE WORK FOR THE
4 ORGANIZATION AS WELL?

5 A YES.

6 Q I WANT TO SHOW YOU --
7 IF I MAY MARK ANOTHER EXHIBIT, YOUR HONOR,
8 AS PEOPLE'S, I THINK, 7.

9 THE COURT: IT IS.

10

11 (MARKED FOR IDENTIFICATION PEOPLE'S
12 EXHIBIT 7, PHOTOCOPY OF CHECK.)

13

14 MR. MATHAI: IT'S ANOTHER CHECK.

15 Q SHOWING YOU WHAT I'VE MARKED AS
16 PEOPLE'S 7, THIS IS A --

17 LET ME SHOW COUNSEL.

18 SHOWING YOU PEOPLE'S 7, DO YOU RECOGNIZE
19 WHAT IS SHOWN IN THIS EXHIBIT?

20 A IT'S A CHECK THAT I WROTE TO KELLY PARK.

21 Q OKAY. AND WHY WOULD YOU WRITE --
22 IS IT FOR A LARGE AMOUNT OF MONEY?

23 A 75,000.

24 Q AND WHY WOULD YOU WRITE A CHECK LIKE THAT
25 FOR KELLY PARK? WAS THAT A COMMON OCCURRENCE?

26 A IT WAS COMMON, WHETHER IT WAS A CHECK OR A
27 WIRE TRANSFER, YES.

28 Q AND WHAT'S THE SCENARIO IN WHICH YOU WOULD

1 HAVE TO SEND MONEY LIKE THAT MUCH MONEY TO KELLY PARK?

2 A KELLY WAS INVOLVED WITH OTHER COMPANIES,
3 INCLUDING THE PHARMACY AND THE COMPOUNDING PHARMACY AS
4 WELL AS, LIKE, A DOG FARM AND AN AVOCADO FARM THAT
5 UWAYDAH HAD.

6 SHE AT ONE POINT WAS -- SHE AND HER SISTER
7 WERE HELPING TO OVERTAKE -- OR TAKE OVER THE BILLING
8 PROCESS FOR GOLDEN STATE AND, I BELIEVE, POSSIBLY
9 FRONTLINE. SO SHE WAS DOING A LOT OF THINGS AND HAD A
10 LOT OF EXPENSES WITH ATTORNEYS AND WITH JUST EVERYDAY
11 EXPENSES RELATED TO THOSE BUSINESSES.

12 Q AND IS THIS CHECK IN PEOPLE'S 7 AN EXAMPLE
13 OF KELLY BEING REIMBURSED FOR PAYMENTS OR GETTING AN
14 ADVANCE FOR MONEY THAT SHE WOULD NEED TO MAKE PAYMENTS
15 WITHIN THE ORGANIZATION?

16 A IT LOOKS LIKE THERE WAS. IT SAYS 25 DUE
17 AS OF 12/18/09, PLUS 50. SO THAT, TO ME, SAYS THAT
18 WE -- HE OWED HER 25 AND THEN GAVE AN ADDITIONAL 50 TO
19 PAY EXPENSES.

20 Q AND WOULD YOU HAVE THESE TYPES OF CHECKS
21 THAT YOU WOULD WRITE TO VARIOUS PEOPLE IN THE
22 ORGANIZATION?

23 A IT WAS USUALLY A WIRE TRANSFER.

24 Q OKAY. WOULD YOU DO THAT WITH PAUL TURLEY?

25 A WITH PAUL, I USUALLY WOULD JUST -- HE
26 WOULD CALL AND ASK IF IT WAS OKAY FOR HIM TO TAKE HIS
27 MONTHLY PAY. IT WAS HARD BECAUSE UWAYDAH OFTEN WOULD
28 SAY NO, WE DON'T HAVE ENOUGH MONEY TO GIVE TO PAUL. SO

1 HE WOULD CALL. AND THEN WHEN I GOT THE APPROVAL FROM
2 UWAYDAH, I COULD THEN TELL HIM GO AHEAD AND WRITE A
3 CHECK, IN WHICH HE WOULD WRITE A CHECK TO HIMSELF, I
4 BELIEVE, MOST TIMES.

5 Q OKAY. AND WITH REGARDS TO THE PROPERTIES,
6 IS IT FAIR TO SAY THAT YOU HAD LOTS OF CONVERSATIONS
7 WITH UWAYDAH ABOUT PAYMENTS THAT WOULD BE NEEDED TO
8 EITHER PAY FOR THE PROPERTIES OR KEEP UP THE
9 PROPERTIES, UPKEEP ON THE PROPERTIES?

10 A YES. WE HAD SEVERAL SPREADSHEETS THAT
11 WOULD SHOW, LIKE, HOW MUCH MONEY WAS IN ALL THE
12 ACCOUNTS AT ANY GIVEN TIME AS WELL AS WHAT BILLS, WHAT
13 WAS DUE FOR EACH PROPERTY OR EACH COMPANY.

14 Q ARE YOU FAMILIAR WITH A COMPANY CALLED
15 MEDCONSULT?

16 A YES.

17 Q HOW ARE YOU FAMILIAR WITH THEM OR WHAT DO
18 YOU KNOW ABOUT THAT COMPANY?

19 A MEDCONSULT WAS A COMPANY THAT CAME TO BE
20 KNOWN AROUND -- EARLY ON, AROUND 2004 I BELIEVE. AND I
21 REMEMBER HIS -- ONE OF HIS ATTORNEYS -- IT WAS EITHER
22 RICHARD GREEN OR MARK WEISS. -- CREATED A CONSULTING
23 AGREEMENT FOR UWAYDAH WITH MEDCONSULT HERE IN THE
24 UNITED STATES.

25 AND WHAT I BELIEVED -- WELL, I'LL FINISH
26 THAT LINE OF THOUGHT BEFORE I GO BACK TO WHAT I BELIEVE
27 ABOUT.

28 AND THEN SOON THEREAFTER THERE WAS A

1 SETTLEMENT AGREEMENT, AND UWAYDAH AGREED TO TRANSFER --
2 TO SIGN GUARANTEES ON ALL OF HIS COMPANIES AND ALL OF
3 THEIR COLLECTIONS IN PAYMENT TO MEDCONSULT FOR WHATEVER
4 SETTLEMENT THERE WAS. I GUESS HE WAS -- MEDCONSULT
5 SAID THAT HE DID NOT ABIDE BY THEIR CONSULTING
6 AGREEMENT. THEREFORE, HE OWED THEM, LIKE, \$10 MILLION
7 OR SOMETHING LIKE THAT.

8 BUT AS I WAS LIVING THROUGH THAT, IT WAS
9 KNOWN THAT MEDCONSULT WAS JUST A WAY FOR UWAYDAH TO
10 SEND MONEY TO LEBANON FIRST AND FOREMOST WITHOUT HAVING
11 TO PAY THE BILLS HERE FIRST BECAUSE HE DID EVERYTHING
12 TO NOT ALLOW THE CREDITORS TO GET FINANCES.

13 OR HE WAITED TO PAY THE OFFICE BILLS LAST
14 BECAUSE HE KNEW THOSE ARE THE ONES THAT WOULDN'T REALLY
15 COME AFTER HIM.

16 Q DID YOU SEE A LOT OF OVERLAP BETWEEN
17 UWAYDAH'S OPERATIONS AND MEDCONSULT?

18 A I REALLY ONLY SAW MEDCONSULT WITH THE
19 \$50,000 A MONTH. THAT WAS ALL IT WAS. I WAS IN
20 COMMUNICATION WITH -- WITH HIS --

21 HIS MOTHER WOULD SOMETIMES CALL OR EMAIL
22 OR SOMETHING AND SAY WHERE IS THE MEDCONSULT MONEY.
23 AND I BELIEVE HIS SISTER AT ONE POINT DID AS WELL.

24 MEDCONSULT FROM, WHAT I SAW WAS -- HAD A
25 BANK ACCOUNT IN LEBANON AT HIS BROTHER-IN-LAW'S BANK,
26 WHICH HIS BROTHER-IN-LAW WAS THE MANAGER OF BOND BANK.

27 IT WAS ALL, LIKE, TIED TOGETHER IN MY MIND
28 THAT HIS FAMILY IS ASKING FOR THE MONEY FROM LEBANON,

1 AND I WOULD SEND IT EVERY MONTH.

2 Q BASED ON YOUR EXPERIENCE WORKING WITH
3 UWAYDAH, DID YOU SEE THAT THE PREMISE OF THE SO-CALLED
4 SETTLEMENT AGREEMENT WAS UNUSUAL IN ALL YOUR OTHER
5 HISTORY WITH UWAYDAH?

6 A NO. IT WAS JUST -- IT WAS NORMAL FOR HIM
7 TO SAY THAT HE OWED SOMEONE MONEY IN ORDER TO NOT PAY
8 SOMEONE ELSE MONEY AS TO HIDE IT.

9 Q AND IS THAT WHAT YOU BELIEVE WAS HAPPENING
10 WITH MEDCONSULT?

11 A YES.

12 Q AND ARE YOU FAMILIAR WITH A COMPANY CALLED
13 CONNEMARA?

14 A I'VE HEARD OF THE NAME, BUT I BELIEVE IT
15 WAS SOMETHING -- I WASN'T PERSONALLY INVOLVED VERY MUCH
16 THAT I CAN REMEMBER.

17 Q OKAY. DID YOU EVER SEE OR COME TO
18 UNDERSTAND UWAYDAH PUTTING PROPERTIES IN REAL ESTATE
19 HOLDING COMPANIES?

20 A THE COMPANIES WERE JUST COMPANIES. I
21 DON'T KNOW THAT I THOUGHT THEY WERE REAL ESTATE HOLDING
22 COMPANIES. THEY WERE JUST COMPANIES CREATED TO HAVE
23 THE PROPERTY NOT IN PAUL'S NAME, NOT IN UWAYDAH'S NAME
24 BUT IN A COMPANY NAME THAT COULDN'T BE TRACED BACK TO
25 UWAYDAH.

26 Q OKAY. AND WAS THAT DONE AT UWAYDAH'S
27 DIRECTION?

28 A YES.

1 Q DID YOU EVER LIVE ON ANY OF THESE
2 PROPERTIES THAT I MENTIONED?

3 A NO.

4 Q DID YOU EVER DO WORK AT ANY OF THESE
5 PROPERTIES?

6 A I WOULD MEET UWAYDAH OCCASIONALLY, BUT I
7 DIDN'T HAVE AN OFFICE AT ANY OF THEM.

8 Q WHERE WOULD YOU MEET UWAYDAH?

9 A I MET HIM AT BEVERLY GROVE PLACE A LOT.
10 AND I MET HIM -- I HELPED HIM OUT WITH GALLEON. I
11 DON'T REMEMBER WHAT. BUT HE HAD A RENTER IN THERE, I
12 THINK, AND HE HAD -- HE LIVED MOSTLY WITH SOMEONE AT
13 5005, 5007. THAT WAS WHERE HIS HOME WAS. AND I WOULD
14 MEET HIM THERE OFTEN AS WELL.

15 Q SO DID YOU -- YOU ACTUALLY HAD KNOWLEDGE
16 THAT UWAYDAH WAS UTILIZING ONE OR MORE OF THESE
17 PROPERTIES FOR HIS OWN PERSONAL BENEFIT?

18 A YES.

19 Q WHAT ABOUT FOR THE BENEFIT OF OTHERS THAT
20 WERE CLOSE TO HIM?

21 A WELL, HE HAD, LIKE, THE BILLING OPERATION
22 FOR SOMETHING. IT MIGHT HAVE BEEN GSP OR ANOTHER
23 COMPANY OUT OF THE 5509 OCEAN FRONT WALK PROPERTY.

24 I BELIEVE AT ONE POINT HE HAD HECTOR
25 LIVING THERE. HECTOR WAS HIS DRIVER. I THINK HE MIGHT
26 HAVE HAD HECTOR LIVING THERE FOR A LITTLE WHILE. AND
27 BEVERLY GROVE PLACE, HE HAD -- HE WAS THERE MOST OF THE
28 TIME. I DON'T KNOW IF ANYONE ELSE LIVED THERE. AND

1 LIKE I SAID BEFORE, 5005 WAS HIS HOME.

2 Q 5509 OR 5007?

3 A 5007.

4 Q ALL RIGHT. WHAT ABOUT -- DO YOU KNOW A
5 PERSON NAMED AMBER WOODLEY?

6 A YES.

7 Q HOW DO YOU KNOW HER?

8 A I KNOW HER -- INITIALLY HE HIRED HER AS A
9 RECEPTIONIST. BUT SHE WAS ALSO DATING HIM FOR SOME
10 TIME DURING THE TIME I WAS THERE.

11 Q OKAY. DID YOU KNOW -- DO YOU KNOW IF SHE
12 EVER LIVED AT ANY OF THESE PROPERTIES?

13 A I THINK I'VE JUST HEARD RECENTLY THAT SHE
14 LIVED IN ONE OF THEM. BUT I DON'T BELIEVE SHE LIVED AT
15 ANY OF THEM WHEN I WAS STILL AROUND.

16 Q OKAY. DID YOU STOP WORKING WITH UWAYDAH
17 AT SOME POINT IN TIME?

18 A YES. I LEFT IN JUNE, 2010.

19 Q WHAT CAUSED YOU TO LEAVE IN JUNE OF 2010?

20 A I WAS SLOWLY ON MY WAY OUT AS IT WAS. WE
21 WERE KIND OF HITTING HEADS ABOUT THINGS, BANK ACCOUNTS.
22 I DON'T REMEMBER SPECIFICALLY WHAT.

23 BUT I ULTIMATELY QUIT THE DAY THAT KAREN
24 THOMPSON CAME OVER FROM SANTA MONICA POLICE DEPARTMENT
25 AND SAID THAT THEY WERE INVESTIGATING THE MURDER OF
26 JULIANNA REDDING.

27 SO AT THAT POINT I JUST SAID ENOUGH IS
28 ENOUGH, AND I LITERALLY -- SHELLY, MYSELF AND MY

1 HUSBAND, WE JUST STOPPED IMMEDIATELY, AND THAT WAS IT.

2 Q AT THE TIME YOU LEFT, WAS THERE -- DID YOU
3 GIVE PROFFER STATEMENTS TO THE PEOPLE OF THE STATE OF
4 CALIFORNIA, THE DISTRICT ATTORNEY'S OFFICE? ALAN
5 JACKSON WAS ONE OF THE PROSECUTORS?

6 A YES.

7 Q AND DID YOU DIRECT INVESTIGATORS TO A
8 STORAGE UNIT IN SANTA MONICA AT SOME POINT IN TIME?

9 A I DON'T REMEMBER HOW IT CAME ABOUT, BUT
10 YES. THEY -- I HAD KNOWLEDGE OF THE STORAGE UNIT IN --
11 I THINK IT WAS IN MARINA DEL REY. BUT SHELLY HAD MORE
12 ACCESS TO THAT. I THINK SHELLY HAD A KEY, AND I DON'T
13 REMEMBER HAVING A KEY.

14 Q AT SOME POINT IN TIME AFTER YOU PROFFERED
15 AND HAD KIND OF -- DID YOU MAKE IT KNOWN TO UWAYDAH
16 THAT YOU WERE NO LONGER AVAILABLE TO HELP HIM?

17 A YES.

18 Q DID YOU COME INTO CONTACT WITH ONE OF
19 UWAYDAH'S LAWYERS NAMED BENJAMIN GLUCK?

20 A YES.

21 Q AND OVER THE COURSE OF NEXT YEAR OR SO DID
22 YOU -- WERE YOU IN CLOSE CONTACT AND NEGOTIATIONS WITH
23 BENJAMIN GLUCK WITH REGARDS TO THE BANK ACCOUNTS, THE
24 BUSINESS ENTITIES, AND OTHER ASSETS THAT YOU WERE
25 CONNECTED TO FOR UWAYDAH?

26 A I WAS. INITIALLY IT WAS ANOTHER LAWYER
27 FIRM, I BELIEVE, OR ANOTHER LAWYER.

28 I BECAME MORE IN CONTACT WITH BENJAMIN

1 GLUCK AFTER UWAYDAH WAS SUING ME WITH DIFFERENT
2 COMPANIES. BUT IT WAS KIND OF EARLY ON GLUCK STARTED
3 TO TRY TO NEGOTIATE TO GET THINGS OF UWAYDAH'S.

4 I DIDN'T HAVE A LOT, BUT IT WAS JUST -- HE
5 WAS TRYING TO, OF COURSE, GET WHATEVER HE COULD THAT HE
6 THOUGHT I HAD POSSESSION OF.

7 Q ULTIMATELY, DID -- WERE YOU SUED BY --
8 WERE YOU SUED MULTIPLE TIMES BY UWAYDAH-CONTROLLED
9 ENTITIES?

10 A YES. I THINK FIVE TO EIGHT TIMES, I
11 BELIEVE.

12 Q YOU'VE BEEN SUED SINCE 2010?

13 A YES.

14 Q IS ONE OF THOSE LAWSUITS A LAWSUIT
15 FRONTLINE MEDICAL VS. MARISA SHERMBECK?

16 A YES.

17 Q AND IN THAT LAWSUIT WAS BENJAMIN GLUCK THE
18 ATTORNEY FOR FRONTLINE?

19 A I THINK SO.

20 Q AND WAS THAT -- IF YOU REMEMBER, WAS THAT
21 CIVIL COMPLAINT THAT WAS FILED AGAINST YOU VERIFIED BY
22 PAUL TURLEY?

23 A I DON'T REMEMBER.

24 Q IF YOU COULD, GIVE US JUST IN GENERAL WHAT
25 WAS THE ALLEGATIONS THAT WERE MADE AGAINST YOU IN THAT
26 CIVIL LAWSUIT?

27 A THE FIRST THREE LAWSUITS KIND OF ALL
28 ROLLED TOGETHER IN MY MIND BECAUSE THE FRONTLINE CASE,

1 I THINK HE SUED FOR MONEY THAT I SUPPOSEDLY EMBEZZLED
2 OR STOLE.

3 AND THEN I HAD -- HE ALSO SUED FROM A
4 DIFFERENT COMPANY SAYING I STOLE SOME MEDICAL EQUIPMENT
5 OR SOMETHING LIKE THAT.

6 AND THEN, AGAIN, THE THIRD COMPANY I THINK
7 WAS JUST ABOUT MONEY.

8 Q OKAY. NOW, WERE THE FACTUAL CLAIMS THAT
9 WERE MADE IN THOSE THREE LAWSUITS YOU'RE TALKING ABOUT
10 FROM THAT ERA, 2011 OR SO --

11 IS THAT RIGHT?

12 A IT WAS 2010/2011.

13 Q WERE THE FACTUAL BASIS OF THOSE CLAIMS
14 THAT YOU HAD EMBEZZLED IN PARTICULAR WAYS, WERE THEY
15 TRUE?

16 A NO.

17 Q DID, IN FACT, AFTER YOU LEFT UWAYDAH'S
18 ORGANIZATION, WAS THERE A DISPUTE OVER A PARTICULAR
19 AMOUNT OF MONEY THAT WAS RETAINED BY YOU AT THAT TIME?

20 A YES.

21 Q AND DID YOU ULTIMATELY SETTLE WITH UWAYDAH
22 OR UWAYDAH ENTITIES WITH REGARD TO THAT AMOUNT?

23 A YES. INITIALLY I HAD TO FILED BANKRUPTCY
24 BECAUSE UWAYDAH WOULDN'T STOP SUING ME, AND I COULDN'T
25 AFFORD TO DEFEND MYSELF ANY LONGER.

26 HE THEN SUED ME IN BANKRUPTCY COURT, WHICH
27 THEN INVOLVED BEN GLUCK. AND HE SPEARHEADED THE
28 SETTLEMENT, WHICH ENDED UP BEING A HIGHER NUMBER THAN

1 WHAT IT SHOULD HAVE BEEN. I JUST NEEDED TO GET UWAYDAH
2 TO LEAVE ME ALONE.

3 Q DO YOU CURRENTLY HAVE ANY LAWSUITS PENDING
4 AGAINST YOU FROM ANY UWAYDAH-CONTROLLED ENTITIES?

5 A NOT THAT I KNOW OF.

6 Q DID YOU ACTUALLY -- DID YOU, IN FACT, GET
7 SUED --

8 AFTER YOU PROFFERED WITH THE PEOPLE IN
9 2017, YOU PROFFERED AGAIN WITH THE PEOPLE.

10 CORRECT?

11 A YES.

12 Q DID YOU GET SUED AFTER THAT PROFFER BASED
13 ON SOMETHING THAT YOU SAID DURING THE PROFFER?

14 A I THINK THE -- YES. I GOT SUED IN
15 2019/2020, AND I THINK THE PREMISE OF THE CASE WAS
16 REGARDING THE SETTLEMENT THAT I HAD MADE WITH THEM BACK
17 IN 2014, 2012 TO 2014.

18 BUT I BELIEVE THEY REFERENCED SOMETHING
19 THAT I HAD SAID IN MY PROFFER.

20 Q WERE YOU AWARE --

21 NOW, WERE YOU SUBPOENAED TO TESTIFY IN A
22 CIVIL CASE WHEREIN NOW YEARS LATER FRONTLINE WAS SUING
23 BENJAMIN GLUCK?

24 A YES.

25 Q AND WHO SUBPOENAED YOU?

26 A BEN GLUCK.

27 Q AND WERE YOU ADDED BY YOUR COUNSEL, AMY
28 JACKS, IN DEALING WITH THAT SUBPOENA?

1 A YES.

2 Q DID YOU HONOR THE SUBPOENA AND SHOW UP TO
3 COURT?

4 A I DID.

5 Q DID YOU TESTIFY IN THAT PROCEEDING?

6 A I DID.

7 Q AND WERE YOU ACCOMPANIED BY AMY JACKS,
8 YOUR LAWYER, DURING THAT TESTIMONY?

9 A YES.

10 Q DID -- WERE YOU ASKED DURING THAT
11 TESTIMONY IN THAT CIVIL PROCEEDING ABOUT THE FACTS
12 UNDERLYING THE FRONTLINE VS. MARISA SHERMBECK LAWSUIT
13 FROM 2011/2012?

14 A YES.

15 Q DO YOU KNOW WHAT RELEVANCE, IF ANY, THAT
16 LAWSUIT HAD TO THE BENJAMIN GLUCK LAWSUIT LAST YEAR?

17 A I THINK THEY WERE JUST TRYING TO DISCREDIT
18 MY TESTIMONY OR TO MAKE ME -- OR TO MAKE ME FALTER, AND
19 BY FALTERING, RUIN MY PLEA AGREEMENT WITH THE DA'S
20 OFFICE. I WASN'T SURE.

21 Q DID DAVID BROWNE OR GEORGE SHOHET --
22 YOU KNOW THOSE PEOPLE?

23 A I KNOW WHO THEY ARE, YES.

24 Q WHO ARE THEY TO YOU?

25 A SHOHET IS ONE OF UWAYDAH'S ATTORNEYS. SO
26 IS BROWNE, BUT I DIDN'T HAVE MUCH KNOWLEDGE OF BROWNE.

27 Q DID EITHER OF THOSE LAWYERS ASK TO SPEAK
28 WITH YOU OR MAKE ANY EFFORT TO SPEAK WITH YOU BEFORE

1 YOUR TESTIMONY?

2 A NO.

3 Q DID THEY EVER OFFER TO SHOW YOU ANY
4 DOCUMENTS ABOUT YOUR PREVIOUS LAWSUIT FRONTLINE VS.
5 MARISA SHERMBECK?

6 A I DON'T THINK SO.

7 Q WHEN YOU TESTIFIED, WERE YOU SHOWN -- WERE
8 YOU CONFRONTED WITH DOCUMENTS THAT SHOWED THAT -- WELL,
9 LET ME ASK YOU THIS WAY.

10 DID YOU BECOME AWARE THAT PAUL TURLEY ALSO
11 HAD ENTERED A FACTUAL PLEA IN THIS CASE AND ENTERED A
12 COOPERATION AGREEMENT WITH THE PEOPLE?

13 A YES, I WAS AWARE OF IT.

14 Q WERE YOU AWARE OF THE SPECIFIC STATEMENTS
15 HE MADE TO THIS COURT IN HIS FACTUAL STATEMENT PLEA?

16 A YES.

17 Q AND HOW ARE YOU AWARE OF THAT?

18 A BECAUSE IT RELATED TO ME. THERE WAS ONE
19 STATEMENT THAT PAUL HAD BASICALLY SUPPORTED MY STANCE
20 THAT I DID NOT USE UWAYDAH'S CREDIT CARD OR MONIES TO
21 BUY PERSONAL ITEMS, SUCH AS JEWELRY AND TRIPS OR CHILD
22 SUPPORT, AS THEY -- AS THEY ALLEGED IN THEIR LAWSUIT.

23 Q AND DID YOU AGREE WITH THAT FACTUAL
24 STATEMENT THAT HE MADE IN THIS COURT?

25 A YES.

26 Q IN THE CIVIL TRIAL GLUCK VS. FRONTLINE OR
27 FRONTLINE VS. GLUCK, WERE YOU EVER CONFRONTED WITH ANY
28 DOCUMENTATION THAT WOULD SHOW THAT THAT STATEMENT BY

1 PAUL TURLEY WAS NOT TRUE?

2 A NO.

3 Q WERE YOU AWARE OF A HEARING THAT WAS
4 PROCEEDING IN THE WORKERS' COMP APPEALS BOARD IN
5 SEPTEMBER AND THE FOLLOWING WINTER OF THIS LAST YEAR
6 REGARDING THE PROSECUTION OF LIENS IN THAT SYSTEM?

7 A YES.

8 Q HOW WERE YOU AWARE OF THAT LAWSUIT?

9 A UP UNTIL RECENTLY I WAS RECEIVING MAILINGS
10 BECAUSE MY NAME WAS STILL ASSOCIATED WITH GOLDEN STATE
11 PHARMACEUTICALS. SO THERE WERE SOME MAILINGS NOTIFYING
12 ME OF CERTAIN HEARINGS AND SUCH.

13 Q THEN WERE YOU EVER ASKED TO TESTIFY IN
14 THOSE PROCEEDINGS?

15 A I DON'T BELIEVE SO. I DON'T REMEMBER
16 RECEIVING ANYTHING SPECIFIC TO THAT.

17 Q BASED ON YOUR EXPERIENCE WORKING WITH
18 FRONTLINE AND MUNIR UWAYDAH FOR THAT MANY YEARS, DO YOU
19 HAVE A GENERAL UNDERSTANDING OF THE IMPORTANCE OF THAT
20 LIEN SYSTEM TO UWAYDAH'S ORGANIZATION?

21 A YES.

22 Q CAN YOU DESCRIBE THAT FOR US?

23 A WHEN AN INSURANCE COMPANY PAYS A BILL,
24 THEY DON'T USUALLY PAY 100 PERCENT. AND WORK COMP -- I
25 DON'T KNOW THE SPECIFICS, BUT I DO KNOW THAT THE
26 MAJORITY OF THE CLAIM THAT IS UNPAID GOES TO A LIEN
27 COLLECTOR. AND THEN THAT IS DEALT WITH IN THAT COURT,
28 YOU KNOW, THAT PROCESS.

1 BUT I WASN'T -- I'M NOT SURE OF THE EXACT
2 PROCESS, BUT I KNOW THAT THE REMAINDER OF ALL OF THE
3 INVOICES THAT WEREN'T PAID OR BILLINGS THAT WEREN'T
4 PAID WOULD GO INTO THE WORK COMP APPEALS BOARD SO THAT
5 THEY COULD POTENTIALLY COLLECT MORE.

6 Q HOW IMPORTANT WAS THAT LIEN SYSTEM TO
7 UWAYDAH BASED ON YOUR EXPERIENCE WORKING WITH HIM?

8 A IT WAS A BIG CHUNK OF MONEY. SO IT COULD
9 HAVE BEEN MILLIONS OF DOLLARS. SO IT WAS VERY
10 IMPORTANT TO HIM TO HAVE THAT COLLECTED.

11 Q AND DID YOU SEE UWAYDAH DO THINGS WITH
12 REGARDS TO FORMING ENTITIES TO HELP COLLECT ON LIENS
13 THAT WERE GENERATED FROM FRONTLINE?

14 A I DON'T REMEMBER AT THIS TIME OF ANY
15 COMPANIES. THAT MIGHT HAVE BEEN AS I WAS ON MY WAY
16 OUT. BUT I CAN'T THINK OF ANY COMPANY.

17 Q BUT AS YOU SIT HERE TODAY, DO YOU HAVE
18 KNOWLEDGE AS TO HOW MUCH MONEY MIGHT BE AT STAKE IN
19 FRONTLINE'S LITIGATION IN THE WORKERS' COMP APPEAL
20 BOARD?

21 A I THINK I JUST KIND OF HEARD THAT IT WAS
22 MILLIONS, BUT I DON'T KNOW AN EXACT NUMBER.

23 MR. MATHAI: THANK YOU.

24 NOTHING FURTHER AT THIS TIME.

25 THE COURT: THANK YOU.

26 I HEARD MR. TURLEY'S NAME A FEW TIMES. DO
27 YOU HAVE ANY CROSS-EXAMINATION?

28 MR. MOEST: A LITTLE BIT.

1 THE COURT: ALL RIGHT. GO AHEAD.

2

3 CROSS-EXAMINATION

4 BY MR. MOEST:

5 Q YOU TESTIFIED ABOUT A SETTLEMENT YOU MADE
6 IN A BANKRUPTCY CASE.

7 A SORRY?

8 Q YOU SAID THERE WAS A SETTLEMENT YOU MADE
9 IN A BANKRUPTCY CASE.

10 A YES.

11 Q WHAT WAS THE NATURE OF THE CLAIM IN
12 BANKRUPTCY AGAINST YOU?

13 A I HAD LISTED UWAYDAH AND ALL OF HIS
14 COMPANIES, PAUL TURLEY, ALL THE ASSOCIATED PEOPLE AS
15 POTENTIAL CREDITORS BECAUSE I KNOW FROM EXPERIENCE WITH
16 UWAYDAH THAT HE WOULD USE ANYONE AND ANY COMPANY TO SUE
17 ME. SO I LISTED THEM IN THE BANKRUPTCY IN THE EVENT
18 THAT I WOULD GET SUED.

19 AND THERE WAS -- WHEN I LEFT WORKING FOR
20 THE DOCTOR, THERE WAS SOME COMPANIES THAT WERE IN MY
21 NAME, BANK ACCOUNTS THAT WERE IN MY NAME THAT MY
22 CRIMINAL ATTORNEY TOLD ME THAT IF I WERE TO TURN THOSE
23 OVER TO UWAYDAH THAT I WOULD BE ARRESTED IMMEDIATELY
24 PER THE DA'S OFFICE. SO HE ULTIMATELY TOLD ME TO KEEP
25 THOSE FUNDS, WHICH I DID.

26 AND SINCE UWAYDAH CONTINUED TO SUE ME FOR
27 THOSE FUNDS, I SETTLED WITH HIM VIA BENJAMIN GLUCK
28 BEING VERY PERSUASIVE, KNOWING THAT UWAYDAH WOULD NEVER

1 LET ME GO. SO I SETTLED TO PAY HIM A SMALL MONTHLY FEE
2 A MONTHLY AMOUNT.

3 Q DID YOU USE THE MONEY IN THOSE ACCOUNTS TO
4 PAY FOR YOUR OWN LAWYERS?

5 A I DID.

6 Q DO YOU KNOW HOW MUCH YOU PAID YOUR LAWYERS
7 OUT OF THAT MONEY?

8 A I DON'T REMEMBER THE NUMBER AS I SIT HERE.

9 Q WOULD IT HAVE BEEN THOUSANDS OF DOLLARS?

10 A HUNDREDS. PROBABLY OVER A 100,000 AT
11 LEAST.

12 Q AND DID YOU USE THAT MONEY FOR ANYTHING
13 ELSE OTHER THAN TO RETURN THE MONEY EVENTUALLY IN
14 PAYMENTS TO UWAYDAH'S INTERESTS?

15 A I USED THE MONEY THAT I HAD AS LIVING
16 EXPENSES. SHELLY ROSE KELLY RECEIVED SOME OF THE
17 MONEY. SO YES, I SPENT THE MONEY.

18 Q AND SHELLY ROSE KELLY, WHO IS THAT?

19 A SHE WAS INITIALLY -- I THINK STARTED AS MY
20 ASSISTANT BUT THEN BECAME ONE OF UWAYDAH'S ASSISTANTS.

21 Q AND DO YOU KNOW WHETHER SHE USED A
22 FRONTLINE CREDIT CARD FOR HER OWN PERSONAL EXPENSES?

23 A I DON'T THINK SHE HAD A FRONTLINE CREDIT
24 CARD.

25 Q DO YOU KNOW WHETHER SHE EMBEZZLED ANY
26 MONEY FROM FRONTLINE OR FROM ANY OTHER ENTITY
27 CONTROLLED BY UWAYDAH?

28 A NOT THAT I CAN THINK OF.

1 Q DO YOU KNOW WHETHER SHE'S ADMITTED
2 EMBEZZLEMENT IN ANY KIND OF A CIVIL PROCEEDING?

3 A NOT THAT I KNOW OF.

4 MR. MOEST: NOTHING FURTHER, YOUR HONOR.

5 THE COURT: THANK YOU.

6 REDIRECT.

7

8 REDIRECT EXAMINATION

9 BY MR. MATHAI:

10 Q JUST A QUICK FOLLOW-UP.

11 OVER THE COURSE OF YOUR COOPERATION
12 AGREEMENT WITH THE PEOPLE, DID YOU KEEP THE PEOPLE
13 APPRISED OF ANY NEW INFORMATION, LIKE LAWSUITS AGAINST
14 YOU OR OTHER INFORMATION YOU WOULD HEAR, WOULD YOU
15 CONTACT US THROUGH YOUR ATTORNEY, AMY JACKS?

16 A YES.

17 MR. MATHAI: THANK YOU.

18 NOTHING FURTHER.

19 THE COURT: ANYTHING FURTHER?

20 MR. MOEST: NO.

21 THE COURT: THANK YOU FOR BEING HERE. YOU MAY
22 STEP DOWN.

23

24 (THE WITNESS LEAVES THE STAND.)

25

26 THE COURT: DO YOU HAVE ANOTHER WITNESS?

27 MR. MATHAI: YES.

28 PEOPLE CALL SHANNON DEVANE.

1 SHANNON DEVANE,
2 CALLED BY THE PEOPLE, AS A WITNESS,
3 WAS SWORN AND TESTIFIED AS FOLLOWS:
4

5 THE CLERK: YOU DO SOLEMNLY STATE THAT THE
6 TESTIMONY YOU ARE ABOUT TO GIVE IN THE CAUSE NOW
7 PENDING BEFORE THIS COURT SHALL BE THE TRUTH, THE WHOLE
8 TRUTH AND NOTHING BUT THE TRUTH, SO HELP YOU, GOD?

9 THE WITNESS: I DO.

10 THE CLERK: PLEASE, STEP FORWARD AND BE SEATED AT
11 THE WITNESS STAND.

12 PLEASE ADJUST THE MICROPHONE COMFORTABLY
13 IN FRONT OF YOU. SPEAKING INTO THE MICROPHONE, PLEASE,
14 STATE AND THEN SPELL YOUR FULL NAME FOR THE RECORD.

15 THE WITNESS: SHANNON DEE MOORE DEVANE,
16 S-H-A-N-N-O-N, MIDDLE NAME IS, D-E-E, HYPHEN, MOORE,
17 M-O-O-R-E, LAST NAME DEVANE, D-E-V-A-N-E.

18 THE COURT: THANK YOU.

19 YOU MAY PROCEED.

20 MR. MATHAI: THANK YOU.

21
22 DIRECT EXAMINATION

23 BY MR. MATHAI:

24 Q MS. DEVANE, YOU WORKED FOR A PERSON NAMED
25 MUNIR UWAYDAH IN THE PAST?

26 A YES.

27 Q HOW LONG AGO WAS IT THAT YOU FIRST MET HIM
28 AND STARTED WORKING WITH HIM?

1 A WELL, I MET HIM IN APPROXIMATELY 2002.
2 AND I STARTED WORKING WITH HIM IN APPROXIMATELY 2004.

3 Q AND HOW LONG DID YOU WORK WITH HIM
4 OVERALL?

5 A I WORKED WITH HIM OFF AND ON UNTIL 2019.

6 Q AND IS IT FAIR TO SAY THAT IN THOSE YEARS
7 YOU BECAME A CLOSE ASSOCIATE WITH HIM AND A CONFIDANTE?

8 A WITH DR. UWAYDAH?

9 Q YES.

10 A YES.

11 Q DID YOU ASSIST HIM IN ALL TYPES OF
12 DIFFERENT THINGS THAT NEEDED TO BE DONE FOR VARIOUS
13 BUSINESS ENTITIES THAT HE CONTROLLED?

14 A YES.

15 Q DID -- CAN YOU TELL US SOME OF THE --
16 DID YOU PUT YOUR NAME ON SOME BUSINESS
17 ENTITIES THAT WERE ACTUALLY OWNED AND CONTROLLED BY
18 HIM?

19 A YES.

20 Q DID YOU DO THAT AT HIS DIRECTION?

21 A YES.

22 Q AND DID YOU DO THAT MULTIPLE OCCASIONS FOR
23 MULTIPLE DIFFERENT COMPANIES?

24 A YES.

25 Q CAN YOU JUST TELL US WHAT COMPANIES YOU
26 PARTICIPATED WITH HIM IN THAT WAY?

27 A THERE WAS A COMPANY CALLED ACCOUNTS
28 RECEIVABLE ACQUISITIONS, WHICH OWNED ACCOUNTS

1 RECEIVABLE LIMITED. SO IT WAS CALLED ARLTD.

2 THERE WAS A CAL REDWOOD. IT WAS LIKE AN
3 MRI COMPANY. NO, I'M SORRY. DME COMPANY.

4 AND THEN THERE WAS MEDICAL SOFTWARE
5 MANAGEMENT.

6 BLUE OAK ASSET MANAGEMENT.

7 Q ARE THOSE SOME OF THE MORE SIGNIFICANT
8 ENTITIES THAT YOU LENDED YOUR NAME TO?

9 A YES.

10 Q AND WITH REGARDS TO ALL OF THOSE ENTITIES,
11 WERE THEY ALL OWNED AND CONTROLLED BY UWAYDAH?

12 A YES.

13 Q WERE SOME OF THOSE ENTITIES FOCUSED ON
14 MANAGING AND COLLECTING ON LIENS IN THE WORKERS
15 COMPENSATION APPEALS BOARD?

16 A YES.

17 Q OKAY. WHAT'S THE SIGNIFICANCE OF LIENS IN
18 THE UWAYDAH ORGANIZATION?

19 A LIKE WHY IS A LIEN DONE OR --

20 Q YEAH. WELL, WHAT'S THE VALUE IN HAVING
21 LIENS TO UWAYDAH?

22 A THE VALUE IS IS THAT THE CLINICS AND
23 HIMSELF PRIMARILY ALSO TREATED -- WE WERE LIKE ON THE
24 APPLICANT'S SIDE, NOT THE DEFENSE. SO A LOT OF THE
25 CLAIMS WERE DENIED CLAIMS. SO WE WOULD HAVE TO PUT
26 LIENS ON THE CASES AND WAIT FOR THE CASES TO SETTLED.

27 AND THEN ONCE THE CASES SETTLED, WE HAVE
28 THESE LIENS WHERE THEY WOULD GO TO WORK COMP APPEALS

1 BOARD. AND DIFFERENT COMPANIES WOULD GO THERE. HE
2 WOULD HIRE THE PEOPLE TO GO THERE TO COLLECT AND GET
3 PAID ON THESE MEDICAL LIENS.

4 Q AND BASED ON YOUR YEARS OF EXPERIENCE
5 WORKING WITH UWAYDAH, WAS -- DID YOU COME TO KNOW THAT
6 THERE WAS A LOT OF VALUE IN THE LIENS THAT UWAYDAH WAS
7 PURSUING OR INTERESTED IN?

8 A YES.

9 Q AND HOW MUCH VALUE WAS THERE?

10 A I DON'T KNOW EXACTLY HOW MUCH MONEY THERE
11 WAS, LIKE, IN THE CLINICS BECAUSE I WASN'T REALLY PART
12 OF THAT WITH FIRSTLINE AND BLUE OAK, LIKE, EXACTLY HOW
13 MUCH WAS OUT THERE.

14 BUT WITH ACCOUNTS RECEIVABLE, I WAS -- THE
15 LIENS WERE FOR SURGERIES DONE AT MISSION COMMUNITY
16 HOSPITAL. AND I ASSISTED WITH DR. UWAYDAH. AND THERE
17 WAS, LIKE, OVER THREE-AND-A-HALF MILLION DOLLARS IN
18 RECEIVABLES THAT HAD CAME IN.

19 Q OKAY. AND IN YOUR -- DID YOU AT SOME
20 POINT IN TIME IN YOUR TENURE WITH WORKING WITH
21 DR. UWAYDAH, WERE YOU CHARGED CRIMINALLY?

22 A YES.

23 Q WHERE WERE YOU CHARGED?

24 A I WAS CHARGED IN RIVERSIDE COUNTY, STATE.
25 I WAS CHARGED IN SAN DIEGO COUNTY, STATE. AND I WAS
26 CHARGED IN SAN DIEGO, FEDERAL.

27 Q AND WHAT TIME PERIOD DID THOSE CHARGES
28 COME AT YOU?

1 A SAN DIEGO STATE AND FEDERAL WAS IN 2018.
2 AND RIVERSIDE, THE INDICTMENT CAME DOWN IN 2019.

3 Q AND IN THOSE PROSECUTIONS AGAINST YOU WERE
4 YOU REPRESENTED BY A LAWYER NAMED ANTHONY COLOMBO?

5 A YES.

6 Q ARE YOU STILL REPRESENTED BY HIM?

7 A YES.

8 Q AND IS HE AWARE THAT YOU'RE TESTIFYING
9 HERE IN THIS COURT TODAY?

10 A YES.

11 Q OKAY. AND SO YOU'RE TESTIFYING WITH HIS
12 KNOWLEDGE AND HIS BLESSING?

13 A YES.

14 Q DID -- IN ANY OF THOSE PROSECUTIONS, DID
15 YOU COOPERATE WITH THE PROSECUTORS IN THOSE CASES?

16 A YES.

17 Q IN WHICH ONES?

18 A ALL OF THEM.

19 Q AND HOW DID YOU COOPERATE?

20 A WITH THE SAN DIEGO FEDERAL AND THE SAN
21 DIEGO STATE, IT WAS KIND OF CONJOINED. BUT I DID WORK
22 UNDER THE DIRECTION OF THE FBI AGENTS. I HAD TO GATHER
23 INFORMATION FOR THEM. I HAD RECORDINGS -- I RECORDED
24 DR. UWAYDAH DIRECTLY ON WHATSAPP PHONE CALLS.

25 Q DID YOU SUPPLY THOSE RECORDINGS TO THE FBI
26 AGENT?

27 A YEAH. EVERYTHING HAD TO BE TURNED IN TO
28 THEM.

1 Q DID YOU AT SOME POINT IN TIME IN 2019 SIT
2 DOWN WITH PROSECUTORS HERE IN LOS ANGELES COUNTY,
3 INCLUDING MYSELF, AND COOPERATE OR EXTEND YOUR
4 COOPERATION BY TALKING TO US?

5 A YES.

6 Q AND DID YOU SHARE THOSE PHONE RECORDINGS
7 WITH US AS PART OF THAT COOPERATION?

8 A YES. I BELIEVE THROUGH THE -- LIKE THE
9 SAN DIEGO AND STUFF EVERYTHING WAS SHARED WITH YOU.
10 YES.

11 Q OKAY. AND LIKEWISE WITH THE PROSECUTION
12 IN RIVERSIDE?

13 A YES.

14 Q DID YOU EVENTUALLY PLEAD GUILTY IN ANY OF
15 THOSE CASES?

16 A I PLED GUILTY IN ALL OF THEM.

17 Q OKAY. DID YOU RECEIVE -- HAVE YOU BEEN
18 SENTENCED IN ANY OF THOSE CASES?

19 A ALL OF THEM.

20 Q WHAT SENTENCE DID YOU RECEIVE?

21 A IN SAN DIEGO STATE, JUST WENT ALONG WITH
22 WHATEVER THE FEDERAL SENTENCED ME. SO I WAS SENTENCED
23 TO THREE YEARS OF FORMAL PROBATION AND 250 HOURS OF
24 COMMUNITY SERVICE.

25 AND THEN IN RIVERSIDE STATE I WAS
26 SENTENCED TO -- IT JUST HAPPENED. I THINK IT'S THREE
27 YEARS ALSO PROBATION.

28 Q OKAY. AND IS THAT PARTLY BASED ON YOUR

1 COOPERATION?

2 A YES.

3 Q IN YOUR EXPERIENCE OVER MANY YEARS WITH
4 UWAYDAH, DID YOU COME TO KNOW OF AN ENTITY KNOWN AS
5 MEDCONSULT?

6 A WHILE I WAS WORKING WITH HIM, NO.

7 Q DID YOU AT SOME POINT IN TIME LATER COME
8 TO UNDERSTAND MEDCONSULT?

9 A YES.

10 Q TELL US HOW THAT HAPPENED.

11 A I WAS WORKING AT MY GRANDFATHER'S SHOP,
12 AND I GOT SERVED PAPERWORK ON A LAWSUIT. AND IT SAID
13 MEDCONSULT VS. MUNIR UWAYDAH. AND I WAS LISTED IN
14 THERE WITH OTHER -- SOME OTHER CO-DEFENDANT. AND THEN
15 SOME OTHER PEOPLE WERE LISTED THERE.

16 Q OKAY. DID YOU NOTICE ANYTHING SIGNIFICANT
17 ABOUT WHO WAS REPRESENTING MUNIR UWAYDAH IN THAT
18 LAWSUIT?

19 A YES.

20 Q WHAT DID YOU NOTICE?

21 A IT WAS GEORGE SHOHEIT. IT WAS AN ATTORNEY
22 THAT ON THE SERVICE LIST SAID ATTORNEY FOR DR. MUNIR
23 UWAYDAH.

24 Q AND DO YOU KNOW HIM?

25 A I DON'T KNOW HIM PERSONALLY. LIKE, I
26 HAVEN'T SPOKEN TO HIM. BUT I HAVE BEEN CROSS-EXAMINED
27 IN THIS COURTROOM BY HIM.

28 Q OKAY. WHEN HE WAS REPRESENTING ANOTHER

1 DEFENDANT?

2 A YES.

3 Q WHAT ABOUT CONNEMARA? ARE YOU FAMILIAR
4 WITH A COMPANY CALLED CONNEMARA?

5 A I'M NOT FAMILIAR WITH THAT COMPANY.

6 Q ARE YOU FAMILIAR WITH A PERSON NAMED AMBER
7 WOODLEY?

8 A YES.

9 Q HOW DO YOU KNOW HER?

10 A AMBER WOODLEY ALSO WORKED FOR DR. UWAYDAH.
11 SHE WAS OVER ALL OF -- LIKE, CONTROLLED HEALTH
12 MANAGEMENT, THE INTAKE COMPANY. SHE WAS OVER SOME OF
13 THE BANKING. SO A LOT OF THE CHECKS FOR DIFFERENT
14 ENTITIES, RENTS, WERE PAID THROUGH HER. SHE DID WIRES
15 TO, I THINK, LIKE, ESTONIA BANKING, THINGS LIKE THAT.

16 Q SO DO YOU ASSOCIATE HER WITH MUNIR
17 UWAYDAH?

18 A YES. THEY ACTUALLY DATED FOR A WHILE AS
19 WELL. UH-HUH.

20 Q OKAY. WERE YOU AWARE OF -- WERE YOU AWARE
21 OF WHERE SHE LIVES?

22 A NOT CURRENTLY. BUT BEFORE SHE LIVED AT
23 DOCTOR -- ONE OF DR. UWAYDAH'S HOMES IN MARINA DEL REY.

24 Q IF I -- ARE YOU FAMILIAR WITH AN ADDRESS
25 OF 5509 OCEAN FRONT WALK IN MARINA DEL REY?

26 A YEAH. THERE WERE TWO ENTITIES. THERE WAS
27 5007 AND THEN 5009.

28 Q OKAY. 5509?

1 A YEAH.

2 Q OKAY. AND DID AMBER LIVE AT ONE OF THOSE
3 LOCATIONS?

4 A YEAH. SHE LIVED AT THE ONE THIS WAY. I
5 THINK IT WAS THE 5009 ONE.

6 Q OKAY.

7 A UH-HUH.

8 Q AND HOW DO YOU KNOW THAT?

9 A I WENT THERE. I HAD TO PICK UP THINGS
10 FROM HER FROM THERE.

11 AT ONE POINT HECTOR WAS LIVING ON ONE OF
12 THE FLOORS, AND I HAD TO GET HECTOR TO MOVE BECAUSE
13 AMBER DIDN'T WANT HECTOR LIVING THERE.

14 MR. MATHAI: YOUR HONOR, AT THIS TIME MAY I MARK
15 A TWO-PAGE DOCUMENT STAPLED IN THE TOP LEFT -- OR
16 ACTUALLY, ON THE TOP RIGHT.

17 AND IT HAS -- EACH PAGE HAS A PICTURE ON
18 IT.

19 MAY I MARK THIS AS PEOPLE'S --
20 THE COURT: 8.

21 MR. MATHAI: -- PEOPLE'S 8.

22 AND I'M OFFERING THIS FOR THE PICTURE.
23 AND I'LL REDACT THE IDENTIFYING INFORMATION ON IT.

24

25 (MARKED FOR IDENTIFICATION PEOPLE'S
26 EXHIBIT 8, TWO PAGES, PHOTOGRAPHS.)

27

28 THE COURT: OKAY. YOU WANT TO SHOW IT TO

1 COUNSEL.

2 MR. MATHAI: ALL RIGHT.

3 Q DO YOU RECOGNIZE THE PERSON DEPICTED IN
4 THIS PHOTOGRAPH ON EACH PAGE?

5 A THAT'S AMBER.

6 Q WOULD YOU HAVE PERSONAL CONTACT WITH HER
7 AT SOME POINT IN TIME?

8 A YEAH. THROUGH WORK WE -- WE DEALT WITH
9 EACH OTHER, YES.

10 Q AND HOW WELL DO YOU KNOW HER? ARE YOU
11 FRIENDS?

12 A NO.

13 Q YOU SAID THAT YOU HAVE BEEN IN THE HOUSE
14 AT 5509 OCEAN FRONT WALK, AND YOU SAW HER THERE?

15 A YES.

16 Q WHEN WAS THAT?

17 A I THINK IT WAS APPROXIMATELY, LIKE, AROUND
18 TWO -- LIKE, I WENT THROUGH A FEW DIFFERENT TIMES.
19 BUT, LIKE, ONE TIME IN PARTICULAR WAS AROUND 2012.

20 Q OKAY. AND DO YOU ASSOCIATE THAT HOUSE
21 WITH MUNIR UWAYDAH IN ANY WAY?

22 A THOSE WERE HIS PROPERTIES.

23 Q HOW DO YOU KNOW THAT?

24 A WELL, UWAYDAH TALKED TO ME ABOUT IT. AND
25 AT ONE POINT HE WANTED ME TO LOOK INTO AIRBNB'ING AND
26 HAVING A HOST AND SEE HOW MUCH THE HOST WOULD CHARGE TO
27 RENT OUT THOSE UNITS BECAUSE HE WAS KIND OF HAVING A
28 HEADACHE, HE SAID, WITH AMBER TRYING TO COLLECT RENTS

1 AND THINGS LIKE THAT FROM PEOPLE THAT WERE STAYING IN
2 SOME OF THE UNITS.

3 Q OKAY. THAT WAS IN 2012?

4 A THAT WAS AFTER 2012. THAT WAS CLOSER,
5 LIKE, 2017 WHEN HE ASKED ME TO LOOK INTO THE AIRBNB.

6 Q OKAY. DID HE EVER TELL YOU WHEN HE ASKED
7 YOU TO DO THAT, DID HE EVER TELL YOU THAT THE PROPERTY
8 WAS ACTUALLY OWNED BY A COMPANY CALLED MEDCONSULT?

9 A NO.

10 Q DID HE EVER TELL YOU THAT IT WAS ACTUALLY
11 OWNED BY A COMPANY THAT HE HAD NOTHING TO DO WITH
12 CALLED CONNEMARA?

13 A NO.

14 Q LET ME ASK YOU ABOUT A FEW OTHER
15 PROPERTIES.

16 ARE YOU FAMILIAR WITH THESE ADDRESSES?
17 5007 OCEAN FRONT WALK MARINA DEL REY.

18 A YEAH.

19 Q IS THAT ONE OF THE ONES THAT YOU HAD BEEN
20 TO?

21 A I WENT THERE, YES.

22 Q IS THAT A UWAYDAH-OWNED PROPERTY?

23 A YES. THERE'S TWO LEVELS, TOO. THERE'S A
24 BOTTOM ONE AND A TOP ONE.

25 Q OKAY. WHAT ABOUT 1316 BEVERLY GROVE
26 PLACE?

27 A YEAH. THAT'S THE -- THE BEVERLY HILLS
28 HOUSE, YES.

1 Q HOW DO YOU KNOW THAT PLACE?

2 A I WENT THERE. I DELIVERED BIRDS FOR HIM
3 THERE.

4 Q 34 GALLEON STREET IN MARINA DEL REY.

5 A THAT ONE, THE NAME IS FAMILIAR. I THINK
6 IT WAS SET OFF. IT WASN'T RIGHT ON THE OCEAN. I THINK
7 IT WAS LIKE A UNIT SET OFF FROM THERE. I NEVER WENT
8 THERE, THOUGH. BUT I KNOW OF IT.

9 Q OKAY. YOU SAID THAT -- YOU MENTIONED THE
10 NAME HECTOR. WHO IS HECTOR?

11 A HECTOR WAS SOMEBODY THAT WORKED WITH
12 DR. UWAYDAH FOR A LONG TIME. HE AT FIRST WAS JUST A
13 DRIVER. HE TOOK CARE OF DR. UWAYDAH'S DOGS. HE ALSO
14 LIVED IN ONE OF THE HOUSES THERE IN MARINA DEL REY WITH
15 HIS WIFE AND CHILDREN.

16 Q I WANT TO ASK YOU ABOUT THAT. WHEN DID HE
17 LIVE THERE IN THE MARINA DEL REY HOUSE?

18 A I DON'T KNOW THE EXACT DATES. I JUST
19 REMEMBER DR. UWAYDAH ASKING ME TO HAVE HECTOR MOVE OUT
20 AND FIND ANOTHER PLACE.

21 Q AND WHEN WAS THAT?

22 A I DON'T KNOW THE EXACT TIME, BUT UWAYDAH
23 WASN'T LIVING HERE. I KNOW THAT HE WAS ALREADY IN
24 LEBANON.

25 Q WELL, WAS IT BEFORE OR AFTER YOU WERE
26 INDICTED IN, SAY, FOR EXAMPLE, RIVERSIDE COUNTY?

27 A OH, BEFORE ANY OF THE INDICTMENTS.

28 Q OKAY. AND THAT WAS IN -- WHAT? -- 2018?

1 A 2018 SAN DIEGO, 2019 RIVERSIDE FOR ME.

2 Q OKAY. AND DID YOU ACTUALLY ASK HECTOR TO
3 MOVE OUT AT UWAYDAH'S REQUEST?

4 A YES, I DID.

5 Q AND DID HE?

6 A HE DID.

7 Q AND DO YOU KNOW --

8 A HE MOVED INTO AN APARTMENT.

9 Q DO YOU KNOW IF ANYONE ELSE MOVED IN THERE
10 AFTER HE MOVED OUT?

11 A I DON'T KNOW. I KNOW THAT AMBER LIVED
12 THERE, BUT I DON'T KNOW -- I THINK SHE WAS AT THE TOP,
13 AND HE WAS MAYBE AT THE BOTTOM OR SOMETHING.

14 Q SO BOTH HECTOR AND AMBER LIVED IN THE SAME
15 PROPERTY, AND YOU BELIEVE THAT WAS 5509 OCEAN FRONT
16 WALK?

17 A YES.

18 Q YOU SAID THAT YOU WERE CHARGED BY SAN
19 DIEGO IN THE STATE COURT. THAT'S SAN DIEGO DA'S
20 OFFICE?

21 A YES.

22 Q WAS -- DO YOU KNOW PAUL TURLEY?

23 A YES.

24 Q DO YOU SEE HIM IN THIS COURTROOM TODAY?

25 A YES.

26 Q CAN YOU TELL US WHERE HE'S SITTING AND
27 WHAT HE'S WEARING, PLEASE?

28 A HE'S RIGHT THERE SMILING WITH GLASSES AND

1 A TIE, LIGHT BLUE SHIRT.

2 THE COURT: INDICATING MR. TURLEY.

3 Q BY MR. MATHAI: WAS PAUL TURLEY CHARGED
4 ALONG WITH YOU IN THE SAN DIEGO STATE PROSECUTION?

5 A YES.

6 Q DID YOU HAVE OCCASION TO SEE HIM IN COURT
7 WHEN YOU WENT TO COURT IN SAN DIEGO ON THAT CASE?

8 A YES.

9 Q AT SOME POINT IN TIME DID YOU BECOME AWARE
10 THAT PAUL TURLEY HAD PLED GUILTY HERE IN THE LOS
11 ANGELES COUNTY CASE AT THE END OF 2018?

12 A I KNEW AS SOON AS HE -- I KNEW --
13 AS SOON AS IT CAME OUT I KNEW.

14 Q HOW DID YOU HEAR ABOUT IT?

15 A DR. UWAYDAH TOLD ME FIRST.

16 Q AND WERE YOU -- AT THAT TIME WHEN PAUL
17 TURLEY PLED, WERE YOU STILL HAVING REGULAR CONVERSATION
18 WITH DR. UWAYDAH?

19 A YES. AND THEY WERE RECORDED. I WAS
20 ALREADY WORKING WITH THE FEDERAL AGENTS.

21 Q AND SO AT THE TIME OF HIS FACTUAL
22 STATEMENT AND PLEA IN THIS COURT, YOU WERE DISCUSSING
23 THAT AND RECORDING IT, THOSE CONVERSATIONS, WITH
24 DR. UWAYDAH?

25 A I DON'T KNOW -- I DON'T REMEMBER EXACTLY
26 WHAT I DISCUSSED WITH DR. UWAYDAH AS FAR AS THAT. I
27 JUST KNOW THAT HE WAS REALLY UPSET THAT HE HAD PLED AND
28 DID A FACTUAL STATEMENT.

1 Q OKAY. DID YOU EVER TELL DR. UWAYDAH IN
2 ANY OF THOSE RECORDED PHONE CALLS ABOUT CONVERSATIONS
3 YOU HAD WITH PAUL TURLEY WHEN YOU WENT TO COURT WITH
4 HIM IN SAN DIEGO?

5 A I BELIEVE WE SPOKE ABOUT HIM BECAUSE AT
6 ONE POINT WE WERE TRYING TO FIND PAUL ANOTHER ATTORNEY
7 TO REPRESENT HIM IN SAN DIEGO.

8 Q AND WHY WERE YOU DOING THAT? OR WHY WAS
9 THAT BEING DONE?

10 A BECAUSE DR. UWAYDAH WANTED HIM
11 REPRESENTED. SO I HAD ASKED MY ATTORNEY ANTHONY IF HE
12 KNEW OF ANYBODY THAT COULD REPRESENT PAUL. AND THEN HE
13 REFERRED -- I DON'T KNOW IF SHE'S A COLLEAGUE OR JUST
14 SOMEBODY IN HER BUILDING, TO PAUL TO REPRESENT HIM.

15 Q WHAT ABOUT IN THE CASE HERE IN LOS
16 ANGELES? DID YOU TALK WITH MUNIR UWAYDAH ABOUT PAUL'S
17 REPRESENTATION?

18 A I MEAN, THROUGHOUT -- THROUGHOUT THE
19 HEARINGS I TALKED TO DR. UWAYDAH VERY OFTEN AFTER
20 HEARINGS REGARDING WHAT WAS HAPPENING, THE MOTIONS,
21 THINGS LIKE THAT, YES.

22 Q IS IT FAIR TO SAY THAT DR. UWAYDAH WAS
23 CONTROLLING OR ATTEMPTING TO CONTROL HOW THE LITIGATION
24 WAS OCCURRING IN THE LOS ANGELES CASE?

25 MR. MOEST: OBJECTION, YOUR HONOR. THAT'S A
26 PRETTY BIG CONCLUSION.

27 THE COURT: OVERRULED. I'M GOING TO ALLOW IT.

28 YOU MAY ANSWER.

1 THE WITNESS: YES. HE SPOKE WITH BENJAMIN GLUCK
2 ON -- LIKE ALMOST EVERY DAY, AND THEY WERE STRATEGIZING
3 AND THINGS LIKE THAT.

4 AND I EVEN AT ONE POINT HAD TO HELP -- I
5 HAD SENT DR. UWAYDAH -- I HELPED WITH, LIKE, THERE WAS
6 A MAYHEM CHARGE WITH A BUNCH OF PATIENTS THAT I HAD TO
7 PREPARE LISTS AND THINGS LIKE THAT TO GIVE TO
8 DR. UWAYDAH. AND HE GAVE IT TO GLUCK, AND I THINK IT
9 WAS PRESENTED.

10 Q OKAY. AND DID YOU DISCUSS IN YOUR
11 CONVERSATIONS WITH DR. UWAYDAH THE -- WINSTON MCKESSON,
12 A LAWYER HERE IN L.A.

13 A YES.

14 Q AND WHAT CONTEXT DID YOU DISCUSS HIM?

15 A WELL, MR. MCKESSON WAS REPRESENTING PETER
16 NELSON. AND THEN AT ONE POINT IN MY RIVERSIDE -- THE
17 CASE THAT I WAS INDICTED, I WAS -- HAD A CO-DEFENDANT
18 BY THE NAME OF JANEK HUNT. AND MCKESSON WAS
19 REPRESENTING HIM AS WELL.

20 Q OKAY. DID YOU TALK TO MUNIR UWAYDAH ABOUT
21 A CONVERSATION YOU HAD WITH PAUL TURLEY IN SAN DIEGO?
22 DID YOU -- DO YOU RECALL A CONVERSATION WHERE YOU
23 REPORTED TO DR. UWAYDAH SOMETHING ABOUT WHAT WAS SAID
24 IN SAN DIEGO BY PAUL TURLEY?

25 A I'M SURE I DID. THERE WAS A LOT OF
26 RECORDINGS THAT I DON'T KNOW -- THERE WAS
27 CONVERSATIONS. I DON'T KNOW WHICH ONE YOU'RE
28 PERTAINING TO.

1 Q SPECIFICALLY, WAS THERE EVER A
2 CONVERSATION WITH PAUL TURLEY IN SAN DIEGO WHEREIN PAUL
3 TURLEY EXPRESSED A DESIRE TO SPEAK WITH MUNIR UWAYDAH?

4 A I DON'T RECALL. I DON'T --

5 Q OKAY. GIVE ME ONE MOMENT.

6 WELL, I DESIRE TO REFRESH HER MEMORY, BUT
7 I DON'T HAVE THE PROPER PAPERS.

8 SO I HAVE NOTHING FURTHER.

9 THE COURT: THANK YOU.

10 CROSS-EXAMINATION.

11 MR. MOEST: I HAVE NO CROSS.

12 THE COURT: ALL RIGHT. YOU'RE EXCUSED. THANK
13 YOU FOR BEING HERE. YOU MAY STEP DOWN.

14

15 (THE WITNESS LEAVES THE STAND.)

16

17 THE COURT: DO YOU HAVE ANY OTHER WITNESSES
18 TODAY?

19 MR. MATHAI: CAN I JUST LOOK IN THE HALLWAY?

20 THE COURT: SURE.

21 MR. MOEST: YOUR HONOR, MAY I RUN TO THE RESTROOM
22 REAL QUICK.

23 THE COURT: YOU MAY.

24

25 (RECESS TAKEN.)

26

27 THE COURT: BACK ON THE RECORD.

28 THE PARTIES ARE PRESENT.